



CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. Austin Raymond Zambach DOB: 1998; United States Katherine Lynn Masalta DOB: 1992; United States	DOCKET NO. MAGISTRATE'S CASE NO. 20-00124-N
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about January 16, 2020, in the District of Arizona, Austin Raymond Zambach and Katherine Lynn Masalta , named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, namely Jason Arce-Carrera and Baltazar Flores-Anzures, and did so for the purpose of private financial gain and placing in jeopardy the life of any person; in violation of Title 8, United States Code, Sections 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On or about January 16, 2020, in the District of Arizona, United States Border Patrol Agents (BPA) saw a 2015 black Hyundai Elantra leave the GasTrack Gas Station in Lukeville. The BPA saw the vehicle stop approximately one mile north from the Port of Entry and the driver and two passengers exited the vehicle. The two passengers got into the trunk of the vehicle and the driver closed the trunk. The vehicle continued north on SR-85 to the immigration checkpoint near Why, AZ. At the checkpoint, BPA only saw two occupants, the driver Austin Raymond Zambach and Katherine Lynn Masalta was the front seat passenger. A service canine performed a free-air sniff of the vehicle and it alerted to the trunk. Also, Zambach gave BPA consent to search the trunk and BPA found two illegal aliens hiding in the trunk. Material witnesses Jason Arce-Carrera and Baltazar Flores-Anzures stated that they or a family member made the arrangements to be smuggled into the United States for money. Both said that they crossed the Border illegally and both said that while in Mexico, a black Hyundai arrived. There was a male driver and a female passenger. They checked if they fit in the trunk of the black Hyundai before they crossed the border. In a post-Miranda statement, Zambach said that he met a man on a social media who offered him a job transporting people for about \$4,000 USD. Zambach said that he knew from the start that he was going to transport illegal aliens. Zambach said that he and his girlfriend crossed the border into Mexico and followed a vehicle to a house. At the house he met the two people aliens that he was to transport to Phoenix and that they practice getting into the trunk of his vehicle. Zambach said that they crossed back into the U.S approximately one hour later and parked at the gas station where the two subjects ran and got into his vehicle. Zambach admitted that he stopped further north and both subjects got into the trunk. In a post-Miranda statement, Masalta said that they parked at the gas station after crossing the border and that they stayed there for approximately 10 minutes and drove north. Masalta claimed that she did not see anybody get in the car.	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: Jason Arce-Carrera and Baltazar Flores-Anzures	
Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA JAA/ri <i>JAA</i>	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Border Patrol Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE January 17, 2020

1) See Federal rules of Criminal Procedure Rules 3 and 54